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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

GEORGE MANDARAKAS,

Defendant.

Case: 2:24-cr-20024
Assigned To : Parker, Linda V.
Referral Judge: Altman, Kimberly G.
Assign. Date : 1/11/2024
Description: INDI USA V. MANDARAKAS (NA)

VIOLATIONS:

18 U.S.C. § 1201(a), (d)
18 U.S.C. § 2261A(1)(B)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

18 U.S.C. § 1201(a), (d)
Attempted Kidnapping

On or about December 25, 2023, in the Eastern District of Michigan, Southern Division, and elsewhere, GEORGE MANDARAKAS attempted to unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold Adult Victim 1 (AV-1), for ransom, reward, and otherwise, and in committing or in furtherance of the commission of the offense, traveled in interstate commerce from New Jersey to Michigan and used a means, facility, and instrumentality of interstate

and foreign commerce, including, but not limited to, motor vehicles, public roads, and cellular telephones, in violation of Title 18, United States Code, Sections 1201(a) and 1201(d).

COUNT TWO
18 U.S.C. § 2261A(1)(B)
Stalking

Beginning in or about October 2023 and continuing through December 25, 2023, in the Eastern District of Michigan, Southern Division, and elsewhere, GEORGE MANDARAKAS traveled in interstate commerce from New Jersey to Michigan, with the intent to harass, intimidate and place under surveillance with intent to harass and intimidate Adult Victim 1 (AV-1), and in the course of and as a result of such travel, engaged in conduct that caused, attempted to cause, and would reasonably be expected to cause substantial emotional distress to AV-1, in violation of Title 18, United States Code, Section 2261A(1)(B).

FORFEITURE ALLEGATION

The allegations of this Indictment are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to Title 18,

United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461.

If convicted of an offense charged and set forth above, GEORGE MANDARAKAS shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to said violation, pursuant to Title 18, United States Code, Section 981(a)(1)(C) together with Title 28, United States Code, Section 2461.

Substitute Assets. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), the defendant shall forfeit substitute property, up to the value of the property described above, if, by any act or omission of the defendant, the property described above cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/Douglas C. Salzenstein
DOUGLAS C. SALZENSTEIN/
Acting Chief, General Crimes Unit
Assistant United States Attorney

s/Nhan Ho
NHAN HO
Assistant United States Attorney

Dated: January 11, 2024

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Assigned To : Parker, Linda V.

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Assign. Date : 1/11/2024

Description: INDI USA V. MANDARAKAS (NA)

United States District Court
Eastern District of Michigan**Criminal Case (**

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: NH

Case Title: USA v. George MandarakasCounty where offense occurred : WayneCheck One: ☒ Felony☐ Misdemeanor☐ Petty☐ Indictment/ ☐ Information --- no prior complaint.☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 23-mj-30505]☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information**

Superseding to Case No: _____ Judge: _____

☐ Corrects errors; no additional charges or defendants.☐ Involves, for plea purposes, different charges or adds counts.☐ Embraces same subject matter but adds the additional defendants or charges below:Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

January 11, 2024

Date



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 Assistant United States Attorney
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.